

TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	147140	Company Name:	Building Materials Investment Corporation	APD Reviewer:	Amber Huddle
Project No.:	278775	Unit Name:	GAF Materials Revision: Add Adhesive Storage Tank	PBR No(s).:	106.261, 106.262, 106.472

GENERAL INFORMATION					
Regulated Entity No.:	RN100788959	Project Type:	Permit by Rule Application		
Customer Reference No.:	CN605251487	Date Received by TCEQ:	December 6, 2017		
City/County:	Dallas, Dallas County	Date Received by Reviewer:	December 8, 2017		
Physical Location:	2600 Singleton Blvd				

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Mr. Bruce Dahlgren Plant Manager	Phone No.:	214-637-8970	Email:	BDAHLGREN@GAF.CO M
Technical Contact/ Consultant Name and Title:	Mr. Kevin Bush Environmental Engineer	Phone No.:	214-637-8933	Email:	KBUSH@GAF.COM

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?	X		Confidential information included in application
Has the PBR fee been paid?	X		Voucher no. 343838
Is this registration certified?	X		PI-7 CERT
Is this an APWL site?		X	
Are there any upstream or downstream affects associated with this registration?		X	
Is planned MSS included in the registration?		X	
Are there affected NSR or Title V authorizations for the project?	X		NSR Permit no. 7711A, Standard Permit No. 91414, O-2771
Is each PBR > 25/250 tpy?		X	
Are PBR sitewide emissions > 25/250 tpy?		X	N/A – Site has been to public notice
Are there permit limits on using PBRs at the site?		X	
Is PSD or Nonattainment netting required?		X	Project emissions are below netting thresholds
Do NSPS, NESHAP, or MACT standards apply to this registration?		X	
Does NOx Cap and Trade apply to this registration?		X	Not located in HGB
Is the facility in compliance with all other applicable rules and regulations?	X		

DESCRIBE OVERALL PROCESS AT THE SITE
GAF is a nationwide manufacturer of building material products. The GAF Dallas Plant manufactures asphalt shingles for the roofing industry. There are two asphalt roofing lines at the GAF Dallas Plant: Line 1 and Line 3. Self-seal asphalt based dots are applied to the asphalt roofing sheets before they are cut into shingles and automatically packaged. Adhesive stripes are applied to the laminated shingles in Line 3 before the shingles are cut and packaged. The existing Line 3 sealant application system is installed to apply self-seal asphalt and laminate self-seal asphalt to the asphalt roofing sheets. The Line 3 sealant application system includes one new Line 3 sealant run tank (Facility Identification Number [FIN]: T-22), associated self-seal applicator (FIN: SEALAP), laminate self-seal applicator (FIN: SEALAP), and a Heatec heater (FIN: HTR9).

DESCRIBE PROJECT AND INVOLVED PROCESS
<p>Building Materials Investment Corporation, doing business as GAF Materials Corporation (GAF) has submitted a PI-7 CERT through ePermits to revise Permit no. 147140 for their asphalt roofing production facility located in Dallas</p> <p>As part of the PBR Revision Application, GAF proposes to install the 3120 Adhesive Storage Tank (FIN: TK-AD [authorized under §106.472]) for the existing Line 3 sealant application. The proposed 3120 Adhesive Storage Tank will also feed the existing self-seal applicator and laminate self-seal applicator to apply dots/strips to the shingles system (authorized under §106.261 and §106.262). The Line 3 Heatec heater (FIN: HTR9) authorized under PBR 106.183 that is currently used to provide heat required by the Line 3 sealant application system will be decommissioned as part of this project. The Line 3 sealant application system will utilize the heat from the existing Line 1 Heatec heater (FIN: HTR1) claimed under PBR §106.183. No changes are proposed to the existing Line 3 sealant run tank.</p> <p>Currently, the Line 3 sealant run tank, self-seal applicator, and the laminate self-seal applicator are controlled by the Line 3 Mist Elimination System (Emission Point Number [EPN]: CFL2). The emissions from the proposed 3120 Adhesive Storage Tank will also be routed to the Line 3 Mist Elimination System (EPN: CFL2) for control. GAF does not expect any increase in actual emission increases from upstream or downstream processes as a result of the proposed project.</p>

TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	147140	Company Name:	Building Materials Investment Corporation	APD Reviewer:	Amber Huddle
Project No.:	278775	Unit Name:	GAF Materials Revision: Add Adhesive Storage Tank	PBR No(s).:	106.261, 106.262, 106.472

TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES

PBR 106.261/262 Compliance Demonstration

- The emission point(s) associated with the facilities or changes to facilities are located at least 450 ft. from the nearest off-site receptor.
- The total new or increase emissions will comply with the applicable hourly and annual emission limits as represented in the table below.
- There are no changes to or addition of any pollution abatement equipment.
- Visible emissions to the atmosphere, from any point or fugitive source, do not exceed 5.0 opacity in any six-minute period.
- This registration is not for authorization for construction or to change a facility authorized under another section of this chapter or under standard permit.

§106.472 Organic and Inorganic Liquid Loading and Unloading

Liquid loading and unloading equipment are permitted by rule, provided that no visible emissions result, and the chemical is limited to asphalt.

PBR 106.261(2)							
Air Contaminant				Emission Limit		Actual Emissions	
				lb/hr	tpy	lb/hr	tpy
CO				6.00	10.00	0.01	0.02
PBR 106.262							
Air Contaminant	L	D	K	Emission Limit		Actual Emissions	
	mg/m ³	ft		lb/hr	tpy	lb/hr	tpy
Asphalt Fume (VOC)	5	450	92.5	0.05	0.24	0.02	0.08
Asphalt Fume (PM)	5	450	92.5	0.05	0.24	<0.01	<0.01
PBR 106.261(3)							
Air Contaminant				Emission Limit		Actual Emissions	
				lb/hr	tpy	lb/hr	tpy
Carbonyl Sulfide				1.00	4.38	<0.01	<0.01

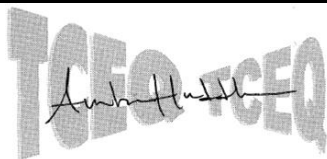

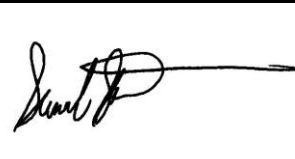
ESTIMATED EMISSIONS

EPN / Emission Source	VOC		CO		PM		PM ₁₀		PM _{2.5}		H ₂ S		Carbonyl Sulfide	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
CFL2 / Line 3 Sealant Adhesive System – Mist Elimination System	0.98	0.58	0.06	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.03	0.02	<0.01	<0.01
TOTAL EMISSIONS (TPY):		0.58		0.05		<0.01		<0.01		<0.01		0.02		<0.01

COMMUNICATION LOG

Date	Time	Name/Company	Subject of Communication
1/2/2018	Morning	Ms. Lele Bao / Trinity	Phone/Email: Reviewer called to request an updated emission summary table or 261/262 table. There is a discrepancy between the two. Ms. Bao provided updated 261/262 table.

SITE REVIEW/DISTANCE LIMIT	Y	N	Description/Outcome	Date	Reviewed by
Site Review Required?		X	No site review required.	1/2/2018	Amber Huddle
PBR Distance Limits Met?	X		Distance limits are met.		

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:			
PRINTED NAME:	Ms. Amber Huddle	Mr. John Bregger	Mr. Samuel Short, Manager
DATE:	January 3, 2018	January 3, 2018	January 5, 2018